

MEMORANDUM TO: Christopher I. Grimes, Program Director October 2, 2002
Policy and Rulemaking Programs
Division of Regulatory Improvement Programs, NRR

FROM: Joseph L. Birmingham, Project Manager /RA/
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF SEPTEMBER 11, 2002, MEETING WITH NUCLEAR
ENERGY INSTITUTE (NEI) ON THE GENERIC LICENSING CHANGE
PACKAGE (GLCP)

On September 11, 2002, Nuclear Regulatory Commission (NRC) staff met with representatives from NEI and industry at the NRC's office in Rockville, Maryland. The purpose of the meeting was to discuss the GLCP and other steam generator issues. Attachment 1 is a list of those attending the meeting.

The meeting began with introductions of those in attendance and a statement of the purpose of the meeting from Bill Bateman, of the NRC. Emmett Murphy, of the NRC, discussed three key outstanding issues, determination of the maximum steam generator inspection intervals, clarification of the 1.4 criterion for tube burst, and revision of the administrative technical specifications (TS) in the GLCP. He said that the NRC needs prescriptive surveillance intervals rather than performance-based, that there is a need to maintain TS control of these intervals, and that the NEI proposals for these intervals appeared to be incomplete. Other issues discussed by Mr. Murphy included degradation activity threshold criteria, loose parts, interpretation of the definition of burst, tube repair methods, and the objectives of degradation assessment. Mr. Murphy also presented sample administrative TS for steam generators (see Attachment 2, ADAMS Accession # **ML022520415**) which would be acceptable to the staff. The presentation slides used by Mr. Murphy are in Attachment 3 (ADAMS Accession # **ML022660068**). NEI discussed these issues with the staff and said most of the issues were addressed in the NEI presentation.

Jim Riley, of the NEI, then presented industry's perspective of the status of the GLCP and the other steam generator issues. The NEI presentation slides are in Attachment 4 to this memorandum (ADAMS Accession # **ML022660095**). Mr. Riley reviewed the status of the GLCP stating that differences between the staff and industry still remained but the differences could be resolved as technical issues on a schedule that would not delay GLCP implementation. He said that industry plans to submit the GLCP through an NEI template and a lead plant submittal before the end of 2002 and a schedule was provided in the handout. He discussed industry's intent to address NRC comments in a September 9, 2002-letter (ADAMS Accession # **ML022520414**) on the GLCP and stated that further TS comments could be addressed through the Request for Additional Information (RAI) process. Mr. Riley then gave the industry's proposal for handling issues such as the definition of burst, operational and accident induced leakage, tube repair criteria, inspection intervals, and degradation activity

threshold. He summarized the presentation by stating that with these changes it was time to submit the GLCP and to address the remaining technical differences through the RAI process.

The staff discussed the issues to clarify the differences between the NEI and NRC positions and discussed the possibility of submitting the GLCP. The staff agreed to summarize the issues pertaining to the GLCP and the status of issue resolution and to include this summary as part of this memorandum. This issue summary (ADAMS Accession # **ML022630148**) is provided in Attachment 5 to this memorandum.

The staff agreed that it was time to submit the GLCP, but the industry needs to address the staff comments in a satisfactory manner. NEI said it would review those comments and make any necessary changes to the package before sending it out to the administrative points of contact for concurrence. The staff noted it needed to discuss the proposed TS action with the TS staff and also to involve the division of project management on the lead plant submittal, however, the staff would work with NEI to implement the proposed schedule of resolution.

During the meeting, Brian Sheron, the NRC Associate Director for Project Licensing and Technical Analysis, spoke on the need to get the GLCP and the other steam generator issues finished. He noted that the effort had been going on for more than four years and appeared to be stuck in a "revolving" comment process. NEI agreed that it was time to finish the submittal of the GLCP and to have a plan for resolution of the remaining technical issues. Mr. Sheron indicated that the NRC needed to see progress or would have to pursue another avenue for resolution of steam generator issues.

After additional discussion of the Three Mile Island tube sever issue and a review of the status of a draft Regulatory Issue Summary on steam generator tube inspection methods, the meeting was adjourned.

Attachments: As stated
PROJECT 689
cc: Jim Riley, NEI

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Accession Nos

ADAMS Package #	ML022660059
Meeting summary	ML022660163
Att. 1 NA	
Att. 2	ML022520415
Att. 3	ML022660068
Att. 4	ML022660095
Att. 5	ML022630148
September 9, 2002 letter to NEI	ML022520414

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*see previous concurrence

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List of Attendees for 9/11/02 meeting on NEI 97-06

<u>Name</u>	<u>Organization</u>
Jim Riley	NEI
Forrest Hundley	Southern Co.
Dan Mayes	Duke Energy
Helen Cothron	TVA
Rick Coe	S. California Edison
Greg Kammerdeiner	First Energy
Bob Exner	PG&E
Rick Mullins	Southern Co.
Robert Cullen	Entergy
Gary Henry	EPRI
Mati Merilo	EPRI
Mohammed Behravesh	EPRI
Dan Mayes	Duke Energy
Jim Begley	Framatome ANP
John Reynoso	Arizona Public Service
Gary Boyers	Florida Power and Light
Brian Mann	Excel Services
Deann Raleigh	LIS, SCIENTECH
Bob Dennig	NRC\NRR\RORP\TSS
Joseph Birmingham	NRC\NRR\RPRP
Bill Bateman	NRC\NRR\EMCB
Louise Lund	NRC\NRR\EMCB
Emmett Murphy	NRC\NRR\EMCB
Ken Karwoski	NRC\NRR\EMCB
John Tsao	NRC\NRR\EMCB
Yamir Diaz	NRC\NRR\EMCB
Cheryl Khan	NRC\NRR\EMCB
Carolyn Lauron	NRC\NRR\EMCB
Bob Tjader	NRC\NRR\RORP
Brian Sheron	NRC\NRR\ADPT